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February 6, 2015

Senator Andrew Maynard
Co-Chair, Transportation Committee
Legislative Office Building
Room 2300
Hartford, CT 06106-1591

Rep. Antonio Guerrero
Co-Chair, Transportation Committee
Legislative Office Building
Room 2301
Hartford, CT 06106-1591

Dear Mr. Chairmen:

In advance of the hearing next week on proposed HB 6344, Google would like to share some high level comments on the bill. We appreciate Connecticut's interest in autonomous vehicles (AV) and the likely goal of encouraging development of AV technology. Unfortunately, based on the caption for the bill, proposed HB 6344 does not meet that goal. Though significant advances are being made, AV technology is still in the early stages of development. As such, any legislative or regulatory requirements imposed now risk being overtaken by advancements in the technology or stifling such advancements.

Establishing a legal structure only for the testing of autonomous vehicles, in addition to being premature, is too narrow of a focus. Instead of a welcoming and "open for business" indicator that might be intended, Google views testing-only laws as a "closed for business" sign.

Equally concerning is the potentially broad authority conferred on the Department of Motor Vehicles to write regulations governing the "use" of autonomous vehicles. Such state specific regulations are perhaps even more premature than laws. At this point in the development of AV technology, regulations run the risk of stymying innovation by imposing unnecessary or ill-suited requirements on a technology that is still very much in a developmental stage.

Given the fact that all of our testing is being done in California and that there is likely limited, at best, testing of AV technology being done elsewhere, Connecticut is not currently behind any curve. So forestalling any legislative or regulatory action now would not put the state at any disadvantage. Should the legislature see a need to act, it could consider undertaking a study to review the motor vehicle code to ensure that AV technology can be accounted for, at the appropriate time, in state law, and that any necessary infrastructure modifications or considerations are brought to light. These are activities that will likely have to be undertaken at some point anyway.

That states are eager to encourage autonomous vehicle technology is great. However, preemptively imposing laws and regulations on technology that is still in a nascent stage sends the wrong signal.

I would be happy to field and questions about these comments or our position.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Barnes", written in a cursive style.

Ron Barnes
Head of State Legislative Affairs